

FILED
CHARLOTTE, NC

UNITED STATES DISTRICT COURT

NOV - 1 2024

for the

Western District of North CarolinaUS DISTRICT COURT
WESTERN DISTRICT OF NC

____ Division

Case No.

3:24-cv-972-KDB

(to be filled in by the Clerk's Office)

Patrick O'Neal Harris

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Superior Judge Office, District Attorney
Office, City of Monroe, State of North
Carolina, Dylan Beach, P. Garcia, see Attach.

Union County Jail, Sheriff Office, Etc.,

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Patrick O'Neal Harris

All other names by which
you have been known:

Patrick Harris, Patrick Oneal Harris

ID Number

37807210, Opus # 441128

Current Institution

Union County Jail, se

Address

3344 Presson RoadMonroe

City

NC

State

28112

Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Dylan Beach, see Attached.Job or Title (*if known*)Deputy

Shield Number

N/A

Employer

Union County Sheriff Office

Address

3344 Presson RoadMonroe

City

NC

State

28112

Zip Code



Individual capacity



Official capacity

Defendant No. 2

Name

S. Eason, P. Garcia, Lt. J. Dennis, etc....Job or Title (*if known*)SGT., Employee, Lieutenant

Shield Number

N/A

Employer

Union County Jail, Union County Sheriff

Address

Office, 3344 Presson RoadMonroe

City

NC

State

28112

Zip Code



Individual capacity



Official capacity

Clerk of U.S. District Court, Western District of
North Carolina,

To Whom it may Concern

I Patrick O'Neal Harris request more Civil Summons
Forms for the following attached listed defendants Stated on
26⁺ John Doe, Etc... Defendants mentioned in Claim(3).

The Plaintiff Harris filing this Complaint / 1983 Bivens / Civil Action / Mass
Tort / Lawsuit / Claim(s) request and Court Order mailed to the
Plaintiff & Union County Jail for the Immediate Release of
All Medical / Inquiry / Grievance(s) Record(s) from Archived / Trash Bin /
Deleted Files / Recycle Bin on / in IC Solutions Hard drive Directly
Filed / Issued / relevant to the Plaintiff Patrick O'Neal Harris
Opus # 441128 D.O.B. 03/16/1989 in the last 6 months - 12 months
be provided to the Court & Plaintiff including Inmate Account
Rec Records, & Booking Record within last 24 months from July - July 2022²⁰²²
/ October - October 2022²⁰²² Photos & Medical & Charges Included.

Thank you

Patrick Harris
Oct. 26th, 2024

Clerk of U.S. District Court Catalog of Items

Oct. 9th, 2024

Page 1 of 2

1. 1 letter to Clerk of Courts, U.S. District Court, Western District Charlotte N.C. 28202
2. 1 Brown/Manilla Envelope Package to Clerk of Courts, U.S. District Courts, Western District Charlotte NC 28202
Containing the following:
 3. 1 Catalog List of all evidence/document(s) mail to U.S. District Clerk of Court(s), W.D. Charlotte NC 28202 2 pages
 4. 6 of 6 attached pages of Filed Complaint by Plaintiff with Clerk of Superior Court, Union County Monroe NC 28112-28111
 5. 26 of 30⁺ pages of Chronological Time/Dated Events starting from 07/30/2024 - 10/09/2024
 6. 5 of 5 legal mail Envelopes Showing as proof of Tampering, by Defendant(s); Mailed By Wendy Maynard, Clerk of Superior Court(s) Union County Monroe NC 28111, NC Prisoner Legal Service Raleigh NC. , Public Defender Office Union County Monroe NC 28112, received by Union County Sheriff Office primarily then Plaintiff Patrick O'Neal Harris secondary at 3344 Presson Rd. Monroe NC 28112
 7. 1 of 1 Hospital admittance Bracelet from 09/09/2024 Atrium Health Monroe NC 28112
 8. 8 of 9 Commissary receipts to verify Proof of locations of Incarcerations, also in Events/Incidents named in "Chronological Dated Events"

Served Proof of Summon Service

Request for More Summons Forms for Defendants listed

Return of Filed Complaint forms w/ Attachments of Statements

Oct. 9th, 2024

page 2 of 2

9. 15 or 15⁺ pages of Submitted / Filed Complaint by Complainant / Plaintiff Harris
10. of Grievances / Inquiries / medical photo & Report(s) / Mail photo(s) Once released by Union County Jail or Subpoena by Court(s);
11. List of Most / any / all Defendants or Updated John / Jane Doe(s)
12. Etc.... Evidence provided later as follows: Videos of incidents; Filed Motion(s) with Clerk, Discovery, Failure To Appear, Loss Income Reports, Arrest Warrants, Hospital Records & Dis^{charged} Papers, Grand Jury Summary, Reporting Officer Narrative ... Etc...

Patrick Harris

Oct. 10th, 2024

I the Complainant / Plaintiff(s) Patrick O'Neal Harris Certify based on provided proof of Location and Facility of Union County Jail assigned Cell / Holding Location Record under F.O.I.A. the named Attestant(s) (eye witness or perceived or Experienced) the aforementioned Claim / Complaint(s) brought against the Defendant(s); Attestant(s): James Brady Thomas IV, Christopher Godwin, Desmond Burns, Sylvester Polk, James Boyd Brown, Joseph Outlaw, Defendant C. Osuch... Etc...

Patrick Harris
Oct. 29th, 2024

Defendant(s) List(s)
Clerk of U.S. District Courts
Western District Charlotte NC.

Attached
page 2 of 11

Facility Employee/Officer(s), Employed by State of North Carolina, Union County, Jail / Detention Facility, Sheriff Office 2024:

1. ¹Ashely Knox, ²S. Eason, ³T. Martin, ⁴C. Drake, ⁵P. Garcia, ⁶M. Green,
7. ⁷Dylan Beach, ⁸L. Furr, ⁹L. Blakely, ¹⁰C. Anderson, ¹¹N. McCann, ¹²J. Long,
13. ¹³William Martin, ¹⁴K. Martin, ¹⁵S. Lucas, ¹⁶S. Hancock, ¹⁷E. Moore, ¹⁸A. Moore, ¹⁹T. Helms,
20. ²⁰Y. Johnson, ²¹Y. Perez, C. Perry, M. Helms, C. Jensen, D. Blythe, K. Gaughran,
27. C. Garcia, M. Persiani, F. Melchor-Flores, D. Helms, J. Stewart, J. Keziah,
33. J. Rutledge, C. D'Apice, M. Baucom, C. Osuch, J. Jarosz, A. English, H. Laney,
40. T. Hamilton, T. Sims, K. Jackson, M. LA SALA, M. Merriman, A. Merriman,
46. A. Keelan, J. Bradley, D. Garcia-Torres, (John/Jane) younts, Cowick
51. Nasutka, Knotts, Barns, Lt. Winfree, Cpt. Coppadge, Grant, Rand,
58. Thomas, Bird, Baker, Brocado, Gomez, Jermaine, " Lt. J. Dennis
65. ("Judge/Magistrate(s)") R. Rollins, Funderburke, L.D. Birch, Hucks, Perry
70. "Medical Staff" Erica Smedley + 15⁺ (John/Jane Does)
72. "Public Defender" Ana (Anna) Dowdy + ^{John Doe} Coordinator of Office
74. Assistant District Attorney also Attorney General John/Jane Doe
of State of North Carolina, Union County, City of Monroe,
Marshville - Wingate Police Department, Mayor's Office, County,

Commissioner's Office

Patrick Harris

Oct. 10th 2024

Defendant No. 3

Name

Job or Title (if known)

Shield Number

Employer

Address

Union County Jail; Union County
Sheriff Office, Superior Judge Office,
District Attorney's Office, Public Defenders
Office, Sheriff Eddie Cathey, Etc 26,⁺
3344 Presson Road, 400 N. Main St., P.O. Box 5038
Monroe NC 28112, 28111-5038

☒ Individual capacity ☒ Official capacity

Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

State of North Carolina, City of Monroe,
Union County, Marshville - Wingate Police
Department, 26⁺ John Doe, Etc...., See Attach...
N/A
N/A
Monroe, Wingate, Marshville, NC 28112-28103
City State Zip Code

 Individual capacity Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

5, USC § 8103; 42 USC § 1312; Art 1 § 19 5 Amend; Due Process, Grievance Rights of Prisoner; Unlawful Use of Force; Excessive Force; Police Brutality; Deliberate Indifference; Negligence; Medical Malpractice; Assault and Battery; 1st 4th, 5th, 8th, 14th Amend.; OHSA; FSA; ADA Title II; PREA; 18 USC § 242, etc...

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

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I I. Basis of Jurisdiction

B. 5 U.S.C. § 8103, 42 U.S.C. § 1312, 18 U.S.C. § 242; Due Process; Grievance Rights/ Procedures of Prisoners; Tampering w/ Incoming/ Outgoing Legal & Personal Mail of Prisoners; Article 1 section 19 of 5 Amend.; Bill of Rights; 1st, 4th, 5th, 8th, 14th Amend; Prison Rape Elimination Act (PREA); Official Health & Safety Act (OHSA); Food Safety Admin. (FSA); Title II American w/ Disability Admin./ Act (A.D.A.); Unlawful Use of Force; Excessive Use of Force; Police Brutality; Deliberate Indifference; Negligence (ent) Behavior; Medical Malpractice; Assault & Battery 14-34.3 Code 1314; False Imprisonment; Wrongful Incarceration; Slander; Deformation of Character... etc..

D. Throughout the PreTrial term of ~~at~~ the plaintiff's Harris in Carceration

In the State of North Carolina, City of Monroe, Union County, Western District
The defendant(s) of the following 1983 Bivens/ Civil Action/ Complaint/ Lawsuit/ Mass Tort Claim(s).

Whom which has Held The Plaintiff in their facility "owned/ Operated by Officer/ Employee(s) of Union County Sheriff Office of the State of North Carolina (located at 3344 Presson Road, Monroe, NC, 28112)" since 7-30-24, until 10-25-24 cont...

The Superior Judge's Office & District Attorney's Office cont.. to willfully, Unlawfully Violate the Plaintiff Bill of Rights, Due Process w/ acts in violation of the law Denial of Probable Cause Hearing, Failure to Disclose Pre Trial Evidence, Waivers of Right, or Probable Cause Hearing Transcripts Rule 404(b) & 18 U.S.C. § 242.

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed. **Since incarcerated on or About the date of 07/30/2024 the defendant(s) has held the aforementioned Plaintiff(s) in their facility in the said Place: State of North Carolina, Union County Jail, Monroe, 3344 Presson Road zip 28112. Placing the Plaintiff in Hazardous Conditions, Assaulting the Plaintiff, denying Due Process Rights and Violating law by act(s) of the mentioned defendants or Failure to act accord to law as stated in 30+ pages of filed Time Events, Failure to provided Medical Services. See Attach....**
- III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☒ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☐ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.
On the date of 07/30/2024 Deputy/Officer Dylan Beach initiated an "Illegal Traffic Stop" which "no violation had been committed" which led to Deformation of Character, Slander, Prejudice/bias intent, Violation of the 4th Amend, Wrongful Incarceration, false Imprisonment, Constr^{structive} Possession, giving Rise to the Events to Follow after Arrested. See Attach....
- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.
On or about the Date(s) 07/30/2024 throughout 10/25/2024 Cont....; upon arrival The Plaintiff was Booked, Processed. See Attached & Previously Mailed documents.

page 4 of 11, X-D Cont...

Moreover Union County Jail allowing its employee/officer(s) "The Defendants" to Assault the Plaintiff Harris, Violate OHSA and Fire Marshal Code, in addition to PREA, by Committance of the Act(s): Placing Plaintiff & other Inmate(s) in Unit(s), Cell(s) Over Capacity/Populated 60-90 men to an 35-60 men unit, 3 men assigned to an 2 men Cell, "no room to walk or use restroom w/o violating personal space", Placing Plaintiff in Units w/ Individuals w/ Rape/sexual Offense, Homosexual tendencies Which watch you as you shower "due to lack of Dividers.

Officers/Employees such as P. Garcia, F.M. Flores, C. Anderson, whom punched the Plaintiff in the Right Ribs Multiple while "Handcuffed Behind the Back and Restrained by Officers against floor of Cell THC-3106 an Cell cover in other Individuals Feces, and Officer/Employees Aka Defendants such as K. Gaughran an Sgt., C. Osuch, J. Jarosz, L. Blakely and other Defendants (who was present during and had knowledge after the fact that allowed or failed to report acts in violation of the law.

IV. Statement of Claims

A. On or About the date of 7/30/2024 near Hwy 218 Fairview N.C. Union County Officer/Deputy Officer Dylan Beach initially performed an Traffic Stop w/o Cause on a White Nissan Maxima ¹. To verify Nc 30 day Temporary Tag wasn't "fraudulent or Counterfeit" once verified ². Alleged in Report the "Tag was Incomplete/partially filled out By DMV!!" ³. No specifics or alleged Traffic Violation for Traffic Stop, ⁴. Performed Search Found drugs and weapon in "Vehicle not belonging to Plaintiff the Passenger" Plaintiff charged w/

D. A. Cont..., B... page 4 of 11

Possession on an Constructive based w/ prejudice. Deputy allowed driver of the "Vehicle to drive away w/ alleged Faulty / Incomplete / partially filled out tag No Citation or Etc..." Giving Rise to: Slander, Deformation of Character, Prejudice / Bias Injustice, Violation of The Plaintiff 4th Amend, False Imprisonment, Wrongful Arrest & Incarceration, including Events following inside the Institution.

B. On or About the date(s) of 7-30-2024 through out the term of 10-25-2024 and Cont...

1. During Booking or Initial Intake Procedures 07/30/2024 by Defendant(s) M. Green, M/A. Merriman, K. Jackson, H. Laney, The Plaintiff had an Seizure and was not provided any medical attention, Instead placed on Metal Bench & Handcuff to Metal rail while waiting to complete booking into Union County Jail. Which lastly Visit was to the Intake Nurse Jane Doe ("More Concerned about the Plaintiff's allergic than information Regarding "Epilepsy Disability 5+ years" and Medication") Request from Prior Incarceration in 2022 where Marshesville - Wingate Police Officer Tased and Damaged the Plaintiff's Harris face during Episode.

2. The Plaintiff Harris was assigned to Cell 3127 A-Pod Unit after Initial Intake Placed on 48 Hour Hold unable or Refused an Free Call by Defendants apparently the Plaintiff had an Epilepsy Seizure Episode in which He awoke in Cell 3129 A-Pod (Housing Unit) with bruised "nose, chest" sore chest, nose, arms, back and etc..., and Defendants stating you fake a seizure...

IV... B... Continued... page 4 of 11

... real good according to Witness / Cellmate James Brady Thomas IV on or about the Morning or Night of 7/31/2024 I had another Episode of Seizure in which "I was slapping the walls saying Deja Vu it's never good and Couldn't breathe or Struggling while Convulsing" and the Defendant(s) Jane / John Doe left me in Thomas IV care w/o any Training OR License "While waiting 20+ minutes before they responded to Call on Emergency Intercom". I was Charge \$20 dollars for Medical Attention not provided then denied Refund by Defendant(s) Lieutenant J. Dennis & Erica Smedley Nurse Accusing Me of Faking Multiple Times in Grievances (being denied inmate copy) or further BP-10 of 12 Resolve.

3. Medication was still not Provided by the Defendant(s) in Union County Jail as My Disability was taken lightly and with Negligence & Malice by all Defendant(s) Named or Listed w/ some report of aforeknowledge Nurse Gomez, Beightler, Smedley, Jermaine, John & Jane Doe, K. Martin, C. Perry, Younts, Furr, P. Garcia, Y. Perez, T. Martin, S. Eason, H. Laney, Co Drake, C. Anderson, Mr. Green, Lt. S. Hancock, Lt. Winfree (Winfrey), M. Helms, W. Martin, E. Moore, Further Etc... Named as my Safety Health & Well Being was Left in the Hands of 2 more Unfamiliar Individuals / Witness / Cellmates Christopher Godwin, Desmond Burns in Cell 3116 B-Pod an 2 men Cell which I was the 3rd men "Sleeping on the floor on a Mat Likely Infested w/ Bed Bugs advised by Defendant J. Bradley. Mr. Burns cell mate (w/o Medical Training) acts Saved my Life on date of 08/08/2024 which an Seriously / Nearly Fatal...

11/90/24

11/90/24

11/90/24

The Complainant/Plaintiff had been in Cell THC-3106 for nearly 7 days minus a few hours w/o access to Sink/Toilet or Shower, Water barely provided, Food attempted to be served through food slot containing feces residue & substance on it, smell of ammonia & sewage/shit & etc... 24/7, Loss of Appetite, Exposure to Bacterial & Viral/Noxious/Pericious diseases or Pathological Conditions such as Tuberculosis, hepatitis, etc..., Officers even stated that the cell the Plaintiff Patrick O'Neal Harris was in THC-3106 was used to place "Crazy or Mad Inmate who liked to throw shit some at Officers/Jail Staff showing Afore Knowledge of the Conditions which the Plaintiff was Confined on 08/08/2024 - 08/10/2024, 08/11/2024 - 08/15/2024 before Moved to THC-3103 and Allowed a Shower with Open Wounds showing Willful Unlawful Intent," by Defendants, while cell window was covered by Magnetic Cover with Big M on it.

The Plaintiff(s) Harris Character Has been "Slanderosly Assaulted" since Traffic Stop by Officer/Deputy/Defendant Dylan Beach in which the Bias/Prejudice "Deformation of Character" began, Accusing the passenger of the Vehicle for "Possession of Fentanyl" (which tested positive as cocaine only) and "Possession of Everything Else Found in" An Vehicle Not Owned or Operated" by the Passenger only Arresting the Passenger/Defendant/Plaintiff Patrick Oneal Harris for Items Not Found on His person and (Not Arresting the Driver who got away using a fake Name or Etc...) Then Union Co. Jail Staff Defendants P. Garcia & Etc... Assaulted the Plaintiff Harris with Known Disabilities then Force Harris to go to Court & Detention & Classified as a Threat to the Chain of Custody & Shackle s on Sept. 09, 2024 for Assault Charges against the Defendants who He was Assaulted by!!

page 4 of 11 : IV, B.... Cont...

... Seizure Episode occurred, that's when the Defendants some not the Majority Realized I was not faking any Epilepsy Incidents and acted less Indifference or Negligent and work toward getting my medications. The Vast Majority of the Defendants still act w/ Negligence & Deliberate Indifference Towards my Conditions failing to Report or Provide Medical Treatment / Evaluation During 30+ Late Night / Early Morning Episode, Failing to provide Medication in accordance w/ Prescription Instructions, Continuing to leave my safety & well being in the hands of untrained inmates, failure to provide Medical Cell.

4. On or About the date of 08/11/2024 merely hours after my serious Epilepsy Seizure Episode I was Returned to Same Cell 3116 B-Pod Housing Unit the Toilet had Overflowed in Multiple Cells that Night on Top Tier Raining Toilet Paper Urine & Feces contaminated on Bottom Tier and even into overpopulated Cells, The Plaintiff Harris was let out of Cell 3116 to take Medication in 9pm-10pm "Med Pass/Pill Line" Administered by Nurse Jane Doe, which Harris asked "Why His Meds was being Distributed improperly?" and Informed to file Grievance on Computer / Kioske. The Plaintiff had no Intentions or Forewarning that it would end in the Results of the Plaintiff being shoved into Door Frame, lip Busted, Slammed, assaulted, Hair pulled, arm & wrist twisted, forehead busted, punched in right ribs, slammed on floor covered in dirt, grim, traces of feces & Etc... with open Wounds, bleeding lip & forehead in a cell w/o sink / Toilet just Barred hole in the floor by Defendants P. Garcia, C. Anderson, J. Jarosz, Sgt K. Gaughran, C. Osuch, etc

Page 4 of 11 : XV, B Cont...

.... J. Long, L. Blakely, S. Eason, F. Melchor-Flores, (the same cell I awoke in 2-Hours prior with no recall) by Etc... Force to stay in filthy cell.

5. Charges was filed against me by P. Garcia for Assault on Govt. Off./Empl. & Resisting Public Officer, The Defendants refused to allow the Plaintiff Harris prior to or After being Served for Police Brutality, Excessive Force, Abusive Treatment of Elderly / Individual w/ Disabilities, Assault & Battery

6. The Plaintiff had been in Jail Now over 60⁺ day and Have not received an Probable Cause Hearing, Dispositionary Hearing, Evidence Hearing, Has been force to sit in Union County Jail based upon Frivolous Charges, and acts Committed by Union County Judicial Center, Sheriff Office, Jail Facility, Superior Judge's Office, District Attorney's Office, Defendant / Employee(s)

7. The failure of the Defendants to Protect / Serve and report the Committance of any act(s) in Violation of the Law w/o Prejudice / Biasness by Fellow Officer / Employee / Defendants makes them Guilty of Aiding & Abetting, Accessory Before / During / After the Facts by denying to perform Sworn Oath of Duty

8. The Plaintiff was Charged w/ FTA while in Custody. Placed in Cells alone in Negligence to Conditions w/o any needed accomadations ...

Oct. 13th, 2024- D. Garcia-Torres & C. Perry served breakfast trays; Y. Johnson & C. D'Apice did 9am-10am "Med Pass Pill Line" escort duties as Nurse Jane Doe administered me "3 of 3 Epilepsy Meds"; D. Blythe & C. Perry served lunch trays; J. Bradley & Y. Johnson served brown bag dinner; T. Martin, S. Eason & C. Jensen did 9pm-10pm "Med Pass Pill Line" escort duties "Malpractice regarding Med Cont..." Nurse Jane Doe Admin... 1 of 3 Epilepsy Seizure Meds; Sgt. S. Eason & C. Jensen passed out "Nail Clipper D-Pod".

Oct. 14th, 2024 - "Columbus Day" A. Keating employee in training by P. Garcia served breakfast trays; F. Melchor-Flores & C. Osuch did 9am-10am "Med Pass Pill Line" escort duties 3 of 3 Epilepsy Meds admin. by Nurse Gomez in D-pod; J. Rand retrieved 4 of 4 outgoing Legal Mail from Patrick Harris (me or I) cell 3161 D-Pod. Letters address to (U.S. District Court: Charlotte NC 2 of 2; Clerk of Superior Court Union County, Public Defender Office Union County NC) F.M. Flores served brown bag lunch; Spoke with Sgt. K. Gaughran regarding Tampered & Missing Mail (legal) 30+ days who informed me the same as Lt. Winfree to "speak w/ Sgt. K. Martin over Classification & Mail," "Appealed Reject Grievances regarding Multiple Issues" Inmate Copies denied James Thomas newly assigned cellmate (who witness multi events prior to present date in

~~Oct. 14th, 2024-~~ A & B-Pod regarding Medical Treatment & Assault(s) relevant to me) who was in "Detox withdrawal Shocks" (W. Keelan OR A. Keelan) & S. Lucas did 9pm-10pm "Med Pass Pill Line" escort duties Admin. 1 of 3 Epilepsy Meds by Nurse T. Jermaine

Oct. 15th, 2024- W. Keelan & C. Anderson served breakfast trays; C. Osuch & J. Long did 9am-10am "Med Pass Pill Line" escort duties 3 of 3 Epilepsy Meds Admin. by Newly trained African American Nurse Jane Doe which 2 of 3 Epilepsy Meds was refused (due to unfamiliarity and failure to verify/identify) 1 of 3 accepted (due to familiarity & identity of Pills); J. Rand & A. Moore refused to pick up mail in entire D-Pod Including 2 of 2 Legal Letters I had in Cell 3161 D-Pod address to U.S. District Court, Charlotte NC, Social Security Office Asheville NC; P. Garcia

and New Training Off/Empty A. Keating came in D-Pod ordering "Escorting on Bottom Tier to Lock down" in Cells as majority was already Complying. F.M. Flores was in attendance also "Targetting Old, Disable Individuals to Use Unlawful & Excessive Force" on; J. Jarosz served bag Lunch; F.M. Flores & S. Lucas served dinner trays; W. Keelan & Thomas did 9pm-10pm "Med Pass Pill Line" escort duties Admin. by Nurse T. ^{& Jane Doe} Jermaine

Oct. 16th, 2024 - W. Keelan & C. D'Apice served breakfast trays; A. Moore retrieved Mail in D-Pod including 2 of 2 Letters I had addressed to (Social Security Office Asheville, NC & U.S. District Court Charleston, SC) after speaking with A. Moore he Confirmed "That He is the Individual opening Legal mail to remove staples then resealing with tape before reopening in presence of Inmates after tampering or having to Change envelopes due to damage, also that He would speak to Sgt. K. Martin about Missing Legal Mail & Etc... Over 30⁺ days;" Y. Johnson & C. D'Apice witness Conversation from an Distance while performing 9am-10am "Med Pass Pill Line" escort duties in which I required/requested administering Nurse Jane Doe to Verify/Identify 2 of 3 of my Epilepsy Meds prior to accepting "unfamiliar pills" from day prior. Knotts & Barnes distributed Commissary Orders; Garcia & C. Osuch served brown bag lunch; C. Jensen & R. Neeley served dinner trays around 6pm-7pm when the effects and Smell of an gas leak (Natural/Propane) incased the whole D-Pod through Ventilation Ducts (Inside/outside) Cells affecting Inmate(s) with & w/o Disability(s), Health Conditions causing Light Headedness, Nausea, Dizziness, Short Breath; Confirmed by Officer(s) R. Neeley, T. Sims, C. Jensen, Garcia whom "refused to Open Cell Doors but Opened Slots & Both Outside Recreation Yard Doors after 10-20+ mins." Afterwards a burning smell engulfed the Cells and D-Pod Officer(s) alleged "New Heating System was Installed" w/o proper precautionary measure taken Obviously; R. Neeley & T. Sims did 9pm-10pm "Med Pass Pill Line" escort duties admin. by Nurse Jane Doe ^{1 of 3 Meds}, Toilets and sinks were out of service for 10-20 mins.

Oct. 17th, 2024- C. Perry & D. Garcia-Torres served breakfast 4 of 5 pills. Y. Johnson & C.D. Apice performed 9am-10am "Med Pass Pill Line" escort duties administered by Hispanic Male Nurse/P.A. (which meds returned to usual looking 4 of 5 pills) or Medications For Epilepsy 3 of 3; J. Rand brought me unusual Mail from NC PLS where they "Thank Me for Recently making Contact w/ them (I only sent 1 of 1 Correspondence via Postal on or about the date 08/22/24 - 09/16/24 regarding Civil Action Assistance) nothing recently regarding Criminal Matters." J. Rand opened also removed the Staple before my presence then presented the letter to me according to policy(ies) & Procedures. Sgt. D. Blythe was on duty, the Outside "recreation yard doors stayed open all morning for precarious cause of precaution Contrary to night prior (last night)" D. G. Torres & C. Perry served brown bag Lunch C. Jensen & R. Neeley served dinner trays. T. Sims performed 9pm-10pm "Med Pass Pill Line" escort duties Administer by Elderly Nurse Jane Doe 1 of 5 pills 1 of 3 medications Contrary to Prescription of Primary Physician & Neurologist.

Oct. 18th, 2024- I wasn't awake for breakfast, C. Osuch & J. Long performed "Med Pass Pill Line" escort duties with Elderly White Nurse Jane Doe administering (5 of 5 pills) 3 of 3 meds Still Contrary to prescribe Instruction C. Anderson & J. Jarasz served brown bag lunch as C. Anderson chewed Snuff/Tobacco & Sunflower seed w/ spit cup in hand while spitting while distributing lunch without Changing Gloves violating FSA; M. Green Served Dinner Trays; S. Lucas & Thomas performed 9pm-10pm "Med Pass Pill Line" escort duties Administered by "Elderly Black Nurse Jane Doe," 1 of 5 pills 1 of 3 seizure meds." While waiting in puddle of water I asked Thomas "Where is the Wet floor Sign?" Then Stated it was a Hazard & Lawsuit if Someone fell!" Thomas stated "That He could get paid if He fell or He could fall and Say Harris (me) did it!" then laugh and added "Oh Garcia aint Here Tonight!" after I mentioned the fact "they want to pick on and jump on me any way with my disability."

10/20/24
11:40 AM
10/20/24 11:40 AM

page 32 of 30+

Oct. 19th, 2024- C. Anderson served breakfast trays, C. Osuch & J. Long performed "Med Pass Pill Line" ^{9am-10am} escort duties (5 of 5 pills) 3 of 3 Epilepsy Meds Admin. by Elderly White Nurse "Jane Doe", A. Keating & P. Garcia served lunch trays, M. Green served brown bag dinner, pass out Razors, M. Green & Thomas performed 9pm-10pm "Med Pass" Escort duties, I was administer (1 of 5 pills) 1 of 3 Epilepsy Meds by "Elderly Black Nurse Jane Doe"

Oct. 20th, 2024- I wasn't awake for breakfast to know who served it. J. Long & F.M. Flores performed 9am-10am "Med Pass" escort duties in which (5 of 5 pills 3 of 3) medications prescribed for "Epilepsy Seizures" was administered by "Elderly White Nurse Jane Doe"; P. Garcia & A. Keating served lunch trays; S. Lucas denied to Supply Cell 3161 D-pod requested Toilet paper. W. Keelan pass out brown bag dinner; P. Garcia, A. Keating, M. Green passed out Nail Clipper around 6:40pm-7pm; Y. Perez, T. Helms, S. Lucas came to rush us in cells in D-Pod as we was doing "Religious Prayer Circle"; S. Lucas still refused to provided "Toilet Tissue" as He performed 9pm-10pm "Med Pass" escort duties while I was Provided "1 of 5 pills 1 of 3 Medications" administered by "Young White Nurse Jane Doe" who waited at the window near shower "Where a pool of standing water Remained w/o any Caution Signs" I ask W. Keelan "for Toilet Tissue due to Outage? He refused to provide with an smirk then alleged He was advised not to provide?!" Air System not working properly.

Oct. 21st, 2024- C. D'Apice served Breakfast, Y. Johnson & C. D'Apice performed 9am-10am "Med Pass Pill Line" Escort duties (5 of 5 pills) 3 of 3 Epilepsy Medication(s) Administered by White Nurse Jane Doe; Y. Johnson & C. D'Apice served brown bag lunch, Outside Recreation yard Doors "Left Open" due too "Air not work Properly or Gas Leak Once More"; T. Knotts passed out Xodigent Kits, C. Jensen served dinner trays, R. Neeley & C. Jensen did perform 9pm-10pm "Med Pass Pill Line" Escorted duties, Multiple Cells almost entire D-Pod sme

Oct. 22nd, 2024- D. Blythe, C. Garcia, Y. Johnson, C. D'Apice, Persiani, 100 performed early morning "Change Out" taking "My Only Clean Clothes" saying we gotta take them it's been 3 days (But none said anything when I comment-ed on the "Facts" of them making/forcing me to wear the same "Jumpsuit For 3 weeks" after speaking to "2 Lieutenant & 4 Sgts," C. Garcia & Persiani served breakfast Trays; C. D'Apice & F.M. Flores performed "Med Pass Pill Line" escort duties administering (5 of 5 pills) 3 of 3 Seizure Meds Nurse Beightler, 100 Served by Lt. Winfrey, Y. Johnson, C. D'Apice; R. Neeley newly Training Male John Doe served dinner trays; Elderly Inmate Sowell that was an 3rd occupant of Cell 3160 (who slept on the Floor) and had cancer in need of treatments was transferred to Cell 3159 all Events occurred in D-Pod; S. Eason & C. Jensen performed 9pm-10pm "Med Pass Pill Line" escort duties 1 of 5 pills 1 of 3 Seizure Meds provided by White Lady Nurse Jane Doe

Oct. 23rd, 2024- C. Anderson, J. Jarosz served breakfast trays; J. Long, C. Osuch did 9am-10am Med Pass Pill Line escort duties 5 of 5 pill 3 of 3 Seizure Meds Administered by Elderly White Male Nurse John Doe; T. Knotts, Sgt. K. Martin, J. Rand, 100 Ms. Barnes distributed Commissary; A. Moore pick up Civil Action Complaint address to Wendy Maynard Union County Clerk of Superior Court P.O. Box 5038, Monroe NC 28111-5038; P. Garcia & A. Keating served brown bag lunch; Thomas served dinner trays; Thomas & S. Lucas performed 9pm-10pm "Med Pass" Escort duties (1 of 5 pills = 1 of 3 seizures) Meds Administered by Elderly Black Nurse Jane Doe

Oct. 24th, 2024- A. Keating & J. Jarosz served breakfast trays; J. Long performed 9am-10am "Med Pass Pill Line" escort duties Administered by Nurse Gomez (5 of 5 pills = 3 of 3 seizure Medications); C. Osuch & C. Anderson served bag lunch; P. Garcia & Thomas served Dinner Trays

Oct. 25th, 2024- Y. Johnson & C. D'Apice served breakfast trays, S.S. and performed 9am-10am Med Pass Pill Line escort duty, C. Perry served lunch bags, C. Jensen & served dinner trays, J. Rand picked up Mail from Patrick Harris 3161 D-Pod outgoing to Clerk of Superior Court Union County, deliver Mail incoming From US District Court W. D. of N.C.

OCT. 26th, 2024- I wasn't awake so I do not know who served breakfast (Defendant D. Blythe, Lt. Winfrey, C. Perry, C. D'Apice, Y. Johnson etc... Did Full Linen Change Out Washed jumpsuit) I was not awake and "Couldn't find my Id Card to ensure I received the proper meds or they were issued to the proper individual so missed morning dosage". Y. Johnson & D'Apice served lunch trays, R. Neeley & T. Sims & newly trained guy served dinner bags & did 9pm-10pm "Med Pass pill line" escort duties, phones were messing up upstairs in D-Pod Conditions of Confinement remained the same.

Oct. 27th, 2024- I wasn't awake for breakfast so I don't know who served. Three voices was heard in the cell 3161 D-Pod as to act as if one was inquiring on my well being because I refused to accept or imbibe or absorb perishable items w/o an visible expiration dates, "due to the facts I've been served Molded bread, cake, Expired (spoiled) Bologna Sandwiches ..etc.." Over looked by Food service & serving off/empty, C. D'Apice & D. Garcia-Torres perform 9am-10am "Med Pass Pill Line" Escort duties Administer by Nurse Beightler (5 of 5 pills 3 of 3 meds), C. Perry & Y. Johnson served lunch trays, C. Jensen & C. Drake & S. Eason served brown bag dinner (Exhaust fans been on All day Temp $\pm 42^{\circ}\text{C}/60^{\circ}\text{F}$ no other clothing provided), R. Neeley & Newly trained staff performed "Med Pass Pill Line" escort duties (3 Meds) Cont. Against Prescribed instruction.

C. What date and approximate time did the events giving rise to your claim(s) occur?

The Events Occurred between the Dates of 07/30/2024 through out 10/25/2024 and Continuing.... 07/30/2024, 08/08/24, 08/11/24, 08/12/24 - 09/09/24, 09/15/24 - 10/25/24... Cont...

D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

Refusal of Probable Cause Hearing & Transcript, Judge Perry, Superior Judge's Office, John Doe District Attorney's Office.

Assault Battery, P. Garcia, J. Jarosz, F.M. Flores, K. Gaughran, C. Osuch C. Anderson... etc.. 20+ John Does

Negligence, Accused of Faking Seizures, Disability, Named Defendants, Lt. J. Dennis, Dennis, Erica Smedly (Smedely)

Placed in Hazardous Condition of Confinement with Open Wounds by Above named Defendant and... etc.. John Does, Union County Jail

V. Injuries Placed in Environment Sexually Harassed by other Individuals due to Showers cond.

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

1. Violation of Constitution Rights - Union County Superior Judge Office, District Attorney Office
2. Injured Ribs - Need X-Ray - treatment or bandaging
3. Epilepsy Seizure - needed proper dosage of Medication, Evaluation Afterward For Injuries, Medical Cell or Accomodations.
4. Injury to upper lip - Needed Cleaning, ointment, bandaging.
5. Injury to Left forehead - Needed cleaning, ointment, bandaging.
6. Mental Anguish - needed proper medical care, Justice For Violation of law by acts of Defendants
7. Pain & Suffering - due to injuries, No justice or redress Punitive, Nominal, injunctive
8. possible Infection - from open wounds feces covered cell, no blood test or etc..
9. Insect bite - Needing Evaluation
10. Breathing Treatment
11. Transportation to Need so. Appointment.
12. Cleaner Safer Condition of Confinement w/o Black Mold of Abestos.

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes.

If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

The Plaintiff Patrick O'neal Harris is Seeking Punitive, Nominal, injunctive: Closure of Facility; Suspension of license; Probational period of punishment; list of recommendation of upgrade, courses before Reinstatement of license Duties; Fines of \$50,000 Fifty thousand dollar per Individual Defendant & \$100,000 A Hundred thousand dollars per Official Capacity of Defendant(s).

All the Above Redress including Monetary Redress of \$4.5 Million dollars minus 20% Taxes for Damages, \$115,000 Fifteen Thousand Per Official Capacity

Fines Defendant(s). Termination of all Defendants permanently, Indefinitely from Field of Careers, Work, w/ no pay (and/or) 3 years imprisonment for Each Defendant(s) to Experience Pain & Suffering the Plaintiff Harris already Endure w/o additional Bullying, Negligence, Xntentional, unlawful Harm & Abusive Treatment. Equal Justice.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

In Union County Jail, Also No Action took place Outside
of Jail or Custody given rising to further Events in Custody
and dating back to 2022

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☐ No

☒ Do not know

If yes, which claim(s)?

Dont Know because I'm use to Federal Prison Grievance
Procedure, here no Inmate Copy is Issued nor is the BP-098 through
BP-13 process is followed the same Individual answer the Original
& Appeal. Violation of PLRA 42 USC § 1997e

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☒ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

At Union County Jail, & through Union County Clerk of Superior Courts, and U.S. District Court, Western District of North Carolina, with Jail Staff Verbally and on Kiosk

2. What did you claim in your grievance?

Violation of OHSA, 1st, 4th, 5th, 8th, 14th Amend; Assault & Battery, Title II ADA; FSA, Tampering w/ Mailing, Due Process, Negligence, Further more Named above, ... Medical Malpractice Failure to Issue Medication Properly, Deliberate Indifference, Injustice.

3. What was the result, if any?

No Result, Ignore, Rejected, Accused of Faking, Told have Courts Request Such Documents, Grievance Inmate Copy, Medical Records photos of Injuries Etc., Statement/Response get an Court order, Etc...

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

I appealed it multiple times on Kioske, Even Started new Grievance same Subject worded Different, went on Diet for days causing seizures due to Low Sugar Levels for Response

Spoke to Different Higher Ranking Officers on Subject who stated we'll look into it Never Did & The Subject was Marked Complete by same Officer answer all Grievances & Appeals. Contact U.S. District Court Western District of North Carolina to file Civil Action,

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

They Ignore Multiple Grievance & never review By Higher Ranking Officers, Lt. J. Dennis always answer Majority Main Defendant accusing me of faking seizure even after serious events occurred

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any: Lt. Winfrey, Sgt. T. Helms, Sgt. K. Martin Younts, Sgt. C. Jensen, Sgt. Eason, E. Moore, A. Moore, C. Osuch, M. LA SALA, K. Gaughran, Union County Superior Court Clerk, Superior Judge's Office, District Attorney's Office, Family Members, U.S. District Court, Western District of North Carolina

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Then I mailed U.S. District Court Western District Charlotte NC 28202. With Names of Defendants, Witness, Catalog, Written Complaint, Filed Complaint w/ Union County Courts & Etc... to file claim

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Patrick O'Neal Harris

Defendant(s) US Attorney General, FBOP

2. Court (if federal court, name the district; if state court, name the county and State)

United States District Court 4th Circuit Charleston, SC 29402

3. Docket or index number

2:23-CV-06282-DCC-M-G-B, 2:23-CV-06916-DCC-M-G-B

4. Name of Judge assigned to your case

Mary G. Baker

5. Approximate date of filing lawsuit

November 26, ²⁰²³ ~~2022~~ to February 02, 2024

6. Is the case still pending?

☒ Yes

☐ No

If no, give the approximate date of disposition. _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Still pending awaiting "Serve" of Defendants.

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☒ Yes

☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) Patrick O'Neal Harris

Defendant(s) White, BOP, Edgefield FCI 2, 20+ John Doe, etc...

2. Court (if federal court, name the district; if state court, name the county and State)

United States District Court, 4th Circuit
85 Broad Street, Charleston, South Carolina 29402,
(901 Richland Street, Suite 1300, Columbia, South Carolina 29201)

3. Docket or index number

2:23-CV-06282-DCC-M-G-B, 2:23-CV-06916-DCC-M-G-B

4. Name of Judge assigned to your case

Mary G. Baker

5. Approximate date of filing lawsuit

November 26, 2023 through February 2, 2024

6. Is the case still pending?

☒ Yes

☐ No

If no, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

IX. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Oct. 25th, 2024

Signature of Plaintiff

Patrick Harris

Printed Name of Plaintiff

Patrick O'Neal Harris

Prison Identification #

441128

Prison Address

3344 Presson Road, Union County Jail
Monroe NC 28112
City State Zip Code

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address